

**BEST AVAILABLE COPY**Remarks/Arguments

The Examiner has rejected applicants claims 1 and 6-8 under 35 USC § 102(b) as anticipated by the Carr patent application publication (US 2001/0040349). The Examiner has further rejected applicants' claims 3, 9-18, 20 and 22-36 under 35 USC § 103(a) based on the Carr publication taken with the Namikawa, et al. patent (US 6,070,911). The Examiner has also rejected claims 19, 21, 37, 40-51, 52, 53, 54, 55-56, 57, 58-60, 52, 54, 57 under 35 USC § 103(a) based on the latter two references taken with one or more of the Schlicht patent (US 5,967,566), the Pabla, et al. patent application publication (US 2004/0137259), the Energy Partners reference and the Guthrie, et al. patent (US 4,786,086). With respect to applicants' claims, as amended, these rejections are respectfully traversed.

Applicants' independent claim 1 recites a "connection assembly for connecting first and second components so as to promote electrical isolation therebetween comprising first and second members adapted to be connected to said first and second components and a dielectric member situated between said first and second members, wherein each of said first and second members includes a through opening and said dielectric member is a disk-shaped member having opposing first and second flat surfaces and a through opening extending between said first and second flat surfaces, said through openings of said first and second members and said dielectric member being such as to allow passage through the through opening of one of the first and second members, through the through opening of the dielectric member, and then through the through opening of the other of the first and second members, and wherein the through opening of said dielectric member is smaller than the through openings of said first and second members."

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Independent claim 37 has similar features.

Such a construction is not taught or suggested by the cited art of record. In particular, the Examiner has argued, with respect to the Carr patent as follows:

"Carr teaches a connection assembly for connecting two components that utilizes a dielectric member situated between two members of the two components, that is disk shaped and has an opening that is smaller than the opening of the two members and an outer portion that extends outward of the two members and utilizes a raised sealing face (abstract, figures 1 and 5, paragraphs [0002]-[0045])."

Applicants disagree. In particular, the Carr publication teaches a pipe joint 11 (see FIG. 2A) having pipe sections 12a, 12b and flanges 14a, 14b. The flanges 14a, 14b have inner diameters 15a, 15b which define the inner peripheral surfaces 20a, 20b. A gasket is placed between the flanges and has an annular region 22 having sides 26 and 28 that make contact with the flange faces. As a result, an inner peripheral surface 20c of the gasket is placed between the inner peripheral surfaces 20a and 20b of the flanges. As can be seen in FIG. 2A, the inner peripheral surface 20c of the gasket aligns with the inner peripheral surfaces of the flanges, since the diameter of the opening of the gasket is equal to the diameter of the openings of the flanges.

Thus, in the Carr publication, the flange openings (defined by inner peripheral surfaces 20a and 20b) and the gasket opening (defined by inner peripheral surface 20c), which allow passage through the opening of one of the flanges, then through the opening of the gasket and then through the opening of the other of the flanges, are designed be equal. This is explicitly stated in the Carr publication at page 2, paragraph [0031], lines 6-12, which state as follows:

"Therefore, it is preferable that the inner diameter 15a of the flange 14a is substantially equal to the inner diameter 15b of the flange 14b and the

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inner diameter 17 of the gasket. This permits a diametric continuity to be maintained across the pipe joint 11 for minimizing flow restriction and trapping, to the extent that the gasket is centered in the joint.”

Thus, as shown and described for FIG. 2A and as shown also in FIGS. 2B, 4, 6A, 7B, 8 and 9, contrary to what the Examiner has stated, the Carr publication teaches a connection assembly for connecting two components (pipes) that utilizes a dielectric member (gasket) situated between two members (flanges) of the two components that has an opening (inner peripheral surface 20c having inner diameter 17) that is equal to the openings (inner peripheral surfaces 20a and 20b having inner diameters 15a and 15b) of the two members. That is the opening in the gasket that allows passage after passage through the opening in one component and prior to passage through the opening in the other component is equal to the openings in the two components.

While the gasket in the Carr publication does have other openings (see, e.g., FIG 1, bolt openings 25 and relief openings 35), these are not openings that allow passage after passage through the opening of one of the two components (inner peripheral surface 20a having inner diameter 15a) and prior to passage through the opening of the other of the two components (inner peripheral surface 20b having inner diameter 15b). Moreover, even if the bolt openings 25 in the gasket could be said to align with the bolt openings in the flanges, there is nothing taught or suggested in the Carr publication that the bolt openings 25 are of lesser diameter than those in the flanges.

Accordingly, applicants' claims in reciting a “dielectric member situated between said first and second members, wherein each of said first and second members includes a through opening and said dielectric member is a disk-shaped member having opposing first and second flat surfaces and a through opening extending between said first and second flat

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surfaces, said through openings of said first and second members and said dielectric member being such as to allow passage through the through opening of one of the first and second members, through the through opening of the dielectric member, and then through the through opening of the other of the first and second members, and wherein the through opening of said dielectric member is smaller than the through openings of said first and second members." patentably distinguish over the Carr publication.

Moreover, the Namikawa, et al. patent has the same failings as the Carr publication in that it teaches in FIG. 1 a pipe joint in which a gasket is held between two weld necks and the opening in the gasket is equal to the openings to that of the weld necks. Thus, applicants' claims also patentably distinguish over the combination of the Carr publication and the Namikawa, et al. patent.

The other cited references, i.e., the Schlicht patent, the Pabla, et al. patent application publication, the Energy Partners reference and the Guthrie, et al. patent fail to add anything to the Carr publication and the Namikawa, et al. patent to change this conclusion. Thus, claims 1 and 37, and their respective dependent claims, also patentably distinguish over the combination of these references.

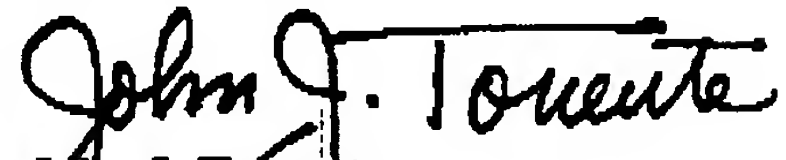
Additionally, the features recited in at least applicants' dependent claims 6, 8-16, 20-21, 28, 30, 32, 37, 40, 42-43, 47, 49, and 53-55 are not believed to be taught or suggested by the cited references. In particular, and the Examiner has pointed to nothing specifically in the cited references which teach or suggest these features. Accordingly, these features are believed to further patentably distinguish such dependent claims over the cited references.

In view of the above, it is submitted that applicants' claims patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

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